STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 18, 2002

Mr. Paul Burgio
Department of the Navy
Engineering Field Activity-Northeast
10 Industrial Highway, MS 82
Lester, PA 19113-2090

Re: Topsham Annex
PCB Characterization & Removal

Dear Mr. Burgio:

The Maine Department of Environmental Protection (MEDEP) has reviewed the revised workplan entitled Draft Remedial Action Plan for PCB Characterization and Removal at Building 335 (DECA Commissary) Transformer Pad, Naval Air Station Brunswick, Brunswick, Maine, dated July 09, 2002, prepared by Foster Wheeler Environmental Corporation. Based on that review the Department has the following comments and issues.

General Comments:

1. Overall the red line strike out revision of the Remedial Action Plan was much improved and there were only a few additional revisions necessary, as outlined below.

2. The most crucial omission is the need for more information in the Quality Assurance Project Plan [QAPP]. As stated in the earlier comment letter, while it may not be necessary to go the effort of a full blown QAPP, it is necessary to provide a basic document which ensures that the data gathered for this project is of sufficient quantity and quality to make regulatory decisions and verify clean up.

   Most of the information requested in that earlier letter has been added although in some cases it is scattered about in the document. Standard Operating Procedures [SOP] still need to be added to the QAPP and must be included for all sampling to be completed in the investigation.

   Sample handling procedures, including sample holding times, and how samples will be delivered to the analytical laboratory must be described. See comment # 10 below for specific recommendations.

Specific Comments:

3. Page 2, Section 2.0, Site Description:

   Please revise as follows: *Naval Air Station, Brunswick (NASB) in Brunswick, Maine, consists of commercial air base operations including barracks housing and four remote family housing sites: Harpswell Housing Facility, McKeen Housing Facility, Brunswick Gardens, and Topsham Annex.*

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Topsham Annex is located approximately four miles northwest of NASB in the Town of Topsham. The Annex is located in the south-central section of the Town of Topsham off Main Street (Route 201), midway between Route 196 and Interstate Route 95.

4. Page 2, Section 2.1, Site Description:

   Please add the following to Section 2.1: *Topsham Annex consists of gently to moderately sloping land with elevation ranging between 240 and 100 feet above mean sea level. Most of the site slopes to the west and northwest, though the land near former Buildings 373 and 374 slope toward the northeast and east respectively.*

5. Page 4, Section 3.2, Delineation of PCB Contamination, para 2:

   "Soil samples will be collected at one-foot intervals to a depth of approximately two feet below the ground surface. Soil samples will be composite for each one-foot interval. The soil be collected from 0' to 1-foot interval and placed in bowl. The material will be thoroughly homogenized prior to collecting an aloquot for analysis...."

   The State prefers that the samples to delineate the plume edge should be taken at 0-3" and used as 0-1'. Taking samples from 0-1 feet is apt to dilute the concentration which resides at the surface and is the most likely to result in human exposure. (Also see comment # 6 in regards to compositing.)

6. Page 5, Section 3.2, Delineation of PCB Contamination, para 2:

   "The detection limit for Arochlor 1254 is 0.5 ppm."

   The remedial action goal is less than 1 ppm, therefore a detection limit of 0.5 for a composited sample analysis even for an estimate of contaminated soil is inadequate. To use a detection limit of 0.5 each sample location would need to be individually tested or the detection limit would need to be low enough to mathematically calculate whether a point exceeds the action level. For example, for 4 aliquots to be composited into one sample a detection limit of less than 0.25 would be necessary to determine if any one of the sampling locations had an exceedence of 1ppm.

7. Figure 2:

   Please add a sampling location in the storm drain and change the collection from 0-1' to 0-3" (per comment # 5 above).

8. Page 8, Section 3.4, Concrete Removal and Disposal, para 2:

   "The containers will be shipped the day after they are full."

   While MEDEP's understands that Foster Wheeler anticipates that the container will shipped for disposal within a day or two after the initial removal action, however some type of deadline needs to be included in this statement. MEDEP recommends the following: The containers will be shipped the day after they are full *or within 30 days of the initial removal action, whichever is less.*

9. Page 12, Section 4.1, Background:

"Confirmation sampling layout is consistent with the EPA Toxic Substance Control Act (TSCA) criteria presented in 40 CFR 761, subpart N and G."

Subpart G pertains to spill cleanup policy and Subpart N pertains to characterization. Subpart O (40 CFR 761.280) pertains to verification of cleanup. Therefore please revise as follows: "*Confirmation sampling layout is consistent with the EPA Toxic Substance Control Act (TSCA) criteria presented in 40 CFR 761, subpart O.*"

10. Page 22, Section 6.0, Quality Assurance Project Plan (QAPP)

This section is still deficient in the information required for a QAPP. Much of the quality assurance information is scattered about the workplan. However the standard operating procedures for taking and compositing the soil samples must be added to this section. As stated in our earlier comments composite samples should be made up of no more than 4 samples.

Below is an outline for sampling, handling and compositing soil samples. This or similar wording must be included in the QAPP. Please note that there are areas noted in red and in all upper case letters that must be filled in by Foster Wheeler.

a.) Add the following to Section 6.4.2:

- *Sample jars will be labeled with the axis location and number of the sampling location to assure that sample jar numbers correspond with the appropriate sampling location.*
- *Visually inspect area of the transformer for staining. Record results of visual inspection in field notebook.*
- *Place pre-numbered sample location pins and flagging. If there is staining one sample will be taken from the stained area. Take samples per delineation plan shown on Figure 2 and for confirmation sampling as outlined in Section 3.6 and figure 3 of this workplan. At each location, remove the vegetation and upper inch of root mass.*
- *Using a single stainless steel sampling scoop, collect samples of soil from each flagged location or proposed composite locations.*
- *Place soil in stainless steel bowl.*
- *Remove organic matter (grass, roots etc) from bowl.*
- *Mix the remaining soil to a uniform consistency by performing the following procedure. Using the same scoop the sample was taken with thoroughly mix the soil in the bowl. Scrape the soil from the sides and bottom and roll the soil into the middle of the bowl and thoroughly mix the soil. The sample will then be quartered. Each quarter will be individually mixed thoroughly by scraping the soil from the sides of the bowl and rolled into itself. When all of the quarters have been individually mixed, the quarters will then be recombined, by scraping and rolling the soil back into the center of the bowl. The entire sample will then be remixed following the above procedure stopping prior to quartering. The sample will then be placed in a properly labeled jar.*
- *Place jar in cooler packed with ice.*
- *Test one jar of sample with screening kit. The screening kits to be used for this project are Strategic Diagnostics Inc. (Neward, NJ) Rapid Assay Field Kit for PCBs. Testing procedures will be in accordance with EPA Method 4020 modified. IDENTIFY RANGE With ranges for PCB of _ PPM, and __ PPM. For this project the screening number for PCBs shall be 1 PPM.*
- *Record result in field notebook.*
- *Dispose of latex gloves, scoop and bowl as Hazardous Waste.*

For confirmation sampling add the following items.

- *Fill out chain of custody forms*
- *Wrap jars with bubble wrap to ensure safe delivery to lab.*
- *The COC form is signed and dated as the samples pass from the collectors to the transporters to the laboratory*

b.) Add the following to Section 6.4.3.1, Dedicated equipment:
The equipment to be used at each sampling location includes, latex gloves, PCB field test kit (for delineation only), *stainless steel scoop, and stainless steel bowl. Used equipment that has come in contact with the soil will be placed in the proper containers and properly labeled as PCB waste for offsite disposal.*

c.) Add the following to Section 6.4.3.2, Sample Handling:
The sample jars will be placed in bubble wrap to avoid damage during transport. A thermometer will be placed in the cooler to periodically check the temperature of the contents.

d.) Add the following to Section 6.4.3.3, Sampling Labeling:
The sample-numbering scheme will be as follows; each sampling location will be identified with an axis location and location *number and this* axis and *number will be used as the sample* id *number. If a duplicate sample is taken from a sampling location then a D will be added to the sample* id *number.*

e.) Please add a section with following information.
A temporary field laboratory will be set up in (IDENTIFY LOCATION TO PERFORM SCREENING TEST) to perform the PCB field-screening test. A clean area will be used to perform the field screening out of the weather.

11. Page 29, Section 6.4.3.2, Sample labeling, para 1:

    Please revise the second sentence as follows: The following information will be placed on every sample: date and time collected, sampler name, sample location (*i.e. Commissary, Topsham Annex, Topsham, Maine), and* sample id number.

12. Page 29, Section 6.4.4, Chain of Custody, last sentence:

    Please change coller to *cooler.*

13. Page 31, Table 3:

    In the table under Initial-Sampling please change Sampling Plan to *QAPP.*

Appendix A:

14. The Gant chart should be updated.

15. Page 3, Section 1.2.6, Soil Excavation, para 1:

    "Container will be stored on-site for less than 30 days prior to off-site disposal."

    Please update as follows: *It is anticipated that roll-off containers will be stored on site for only 1 day after loading prior to off-site disposal, therefore the containers will be shipped the day after they are full or within 30 days of the initial removal action, whichever is less.*

16. Page 5, Section 1.2.11 Demobilization, para 2, bullets:

    The contaminated equipment must be cleaned in a dedicated decontamination area because liquid waste cannot be mixed with soil waste. The equipment should be cleaned with an aqueous based cleaner and decontamination must be confirmed with wipe samples of less than 10 ppb. The cleaning solution and soil debris must be captured, sampled and tested prior to disposal or disposed of as PCB contaminated waste.

17. Page 7, Section 3.0, Site Location and Description:

    Please revise as follows: *Naval Air Station, Brunswick (NASB) in Brunswick, Maine, consists of commercial air base operations including barracks housing and four remote family housing sites: Harpswell Housing Facility, McKeen Housing Facility, Brunswick Gardens, and Topsham Annex.*

    Topsham Annex is located approximately four miles northwest of NASB in the Town of Topsham. The Annex is located in the south-central section of the Town of Topsham on Main Street (Route 201), midway between Route 196 and Interstate Route 95.

Thank you for the opportunity to review this workplan. Please be sure that you or someone from Foster Wheeler notifies me when the proposed work will start. Please call me (207) 287-7713 if you have any questions or concerns regarding these comments.

Respectfully,

Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Tony Williams-NAS-B (email copy only)
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